

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**PETER D'AMBROSIO AND MARCIA A.
D'AMBROSIO, AS CO-ADMINISTRATORS OF
THE ESTATE OF DANIEL MICHAEL
D'AMBROSIO AND IN THEIR OWN RIGHT**

Plaintiffs,

v.

**HAWKER BEECHCRAFT CORPORATION,
RAYTHEON COMPANY, BAE SYSTEMS, INC.
AND BAE SYSTEMS, PLC**

Defendants.

Civil Action No.: 5:10-CV-04848-RBS

UNOPPOSED MOTION FOR ADMISSION *PRO HAC VICE* OF MICHAEL G. JONES

Pursuant to Local Rule of Civil Procedure 83.5.2, I, Mary Grace Maley, one of the attorneys for defendants, Hawker Beechcraft Corporation ("HBC") and Raytheon Company ("RC"), move the Court for the admission *pro hac vice* of Michael G. Jones in the above-captioned matter. In support of this motion, I make the following averments:

1. I am an active member in good standing of the Bar of the Supreme Court of Pennsylvania, the United States District Court for the Eastern District of Pennsylvania, the United States District Court for the Middle District of Pennsylvania and the United States District Court for the Western District of Pennsylvania.

2. My firm has been retained by defendants, HBC and RC, to represent them in this matter, in conjunction with the law firm of Martin, Pringle, Oliver, Wallace & Bauer, L.L.P. in Wichita, Kansas.

3. As more fully set forth in the Affidavit of Michael G. Jones, attached hereto as Exhibit "A", Mr. Jones is duly licensed and admitted to practice law before all courts in the State of Kansas, Oklahoma and Colorado as well as the United States District Court for the District of Kansas and the Tenth Circuit of Appeals.

4. Mr. Jones is a member in good standing of every jurisdiction where he has been admitted to practice and there are no disciplinary proceedings pending against him in any jurisdiction. In addition, he is familiar with the Federal Rules of Civil Procedure, the Local Rules for the United States District Court for the Eastern District of Pennsylvania and the Policies and Procedures of this Court.

5. HBC and RC specifically request that Martin, Pringle, Oliver, Wallace & Bauer, L.L.P. and Mr. Jones represent their interests in the above-captioned litigation because of their longstanding relationship with Martin, Pringle, Oliver, Wallace & Bauer, L.L.P. and Mr. Jones' familiarity with the specific issues presented in this case, as co-counsel with myself and Ricky M. Guerra.

6. Specifically, this case arises from an airplane crash on July 31, 2008 in Owatonna, MN involving a Hawker 800 aircraft that plaintiffs allege to be defective and Mr. Jones is a specialist in this area and has litigated these types of cases in the past for HBC and RC.

7. It is the desire of HBC and RC that Mr. Jones assist in their representation in this matter because of his familiarity with the issues and defenses likely to be raised.

8. All pleadings, motions, notices and other papers can be served conformance with the Federal Rules of Civil Procedure and the rules of this Court upon co-counsel, myself and Mr. Guerra.

9. The established fee for admission is being paid simultaneously with the filing of this motion pursuant to Local Rule of Civil Procedure 5.1.2.

10. Upon admission, Mr. Jones shall complete and submit all forms necessary to become a registered user of the ECF filing system of this Court.

11. Under the circumstances, Mr. Jones meets the criteria for admission *pro hac vice* under Local Rule of Civil Procedure 83.5.2.

WHEREFORE, as counsel for defendants, HBC and RC, I respectfully request that this Court grant this motion and the application of Michael G. Jones for admission *pro hac vice*.

Respectfully submitted,

LAVIN, O'NEIL, RICCI, CEDRONE & DiSIPIO

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DATED: October 5, 2010